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U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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7 Enterprises, Inc., DC Comics,
and Sanrio, Inc.

8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 Disney Enterprises, Inc., DC Comics and
12 Sanrio, Inc.,

CV12-07347-DDP/JC
Case No.

13 Plaintiffs,

14 v.

15 Jason Lancaster, an individual and d/b/a
16 www.partyanimalssoc.com; The Party
17 Animals, LLC; and Does 1 – 10,
inclusive,

18 Defendants.

19
20 COMPLAINT FOR COPYRIGHT
INFRINGEMENT; TRADEMARK
INFRINGEMENT; UNFAIR
COMPETITION; TRADEMARK
DILUTION; DECLARATORY
RELIEF

21 DEMAND FOR A JURY TRIAL

22 Plaintiffs Disney Enterprises, Inc., DC Comics and Sanrio, Inc. (collectively
23 “Plaintiffs”) for their Complaint allege as follows:

24 **ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

25 **A. Introduction**

26 1. Plaintiffs filed this action to combat the willful sale or rental of
unlicensed and counterfeit products bearing the Plaintiffs’ exclusive copyrights and
trademarks. Defendants are the owners, operators, and managers of a retail business
or related enterprise that is actively selling, offering for sale, renting, distributing, or
manufacturing unlicensed and counterfeit costumes, which incorporate unauthorized

1 likenesses of the animated or live action characters or other logos owned by
2 Plaintiffs, including, but not necessarily limited to, Mickey Mouse, Minnie Mouse,
3 Pluto, Goofy, Winnie the Pooh, Tigger, various characters from the motion picture
4 *Toy Story* and Handy Manny (from the television series *Handy Manny*), Batman,
5 Robin, Superman, Wonder Woman, Super Girl, The Joker, Hello Kitty and Dear
6 Daniel (collectively “Infringing Product”).

7 2. Plaintiffs seek a permanent injunction, damages, costs, and attorneys’
8 fees as authorized by the Copyright Act, Lanham Act and California’s common law.

9 **B. Jurisdiction and Venue**

10 3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §
11 1338(a) as the Plaintiffs’ cause of action arises under The Copyright Act, 17 U.S.C.
12 § 101 and the Federal Trademark Act (“The Lanham Act of 1946”), 15 U.S.C. §
13 1051 et seq. Further, this Court has jurisdiction over Plaintiff’s California state
14 statutory and common law claims pursuant to 28 U.S.C. § 1367.

15 4. Venue is proper within the Central District of California pursuant to 28
16 U.S.C. §§ 1391(b) and 1400(a).

17 **C. Plaintiffs**

18 5. Plaintiff Disney Enterprises, Inc. (“DEI”) is a corporation, duly
19 organized and existing under the laws of the State of Delaware, having its principal
20 place of business in Burbank, California.

21 a. DEI is a subsidiary of The Walt Disney Company (“Disney”).

22 b. Disney, together with its subsidiaries, is a diversified worldwide
23 entertainment company with operations in five business segments: Media Networks,
24 Parks and Resorts, Studio Entertainment, Consumer Products and Interactive Media.
25 Media Networks comprises international and domestic cable networks and its
26 broadcasting business; Parks and Resorts comprises resorts and theme parks around
27 the world, the Disney Cruise Line and licensed theme parks such as Tokyo Disney
28 Resort in Japan; Studio Entertainment comprises live-action and animated theatrical

1 and video motion pictures, musical recordings and live stage plays; Consumer
2 Products comprises relationships with licensees, manufacturers, publishers and
3 retailers throughout the world to design, develop, publish, promote and sell a wide
4 variety of products based on DEI's intellectual property as well as its own publishing
5 and retail businesses; Interactive Media Group creates and delivers branded
6 entertainment games and lifestyle content across interactive media platforms.

7 c. A significant aspect of Disney's business is the merchandising
8 and licensing of distinctive elements associated with DEI's motion picture, television
9 programs. The distinctive elements licensed and/or merchandised include, but are
10 not limited to, the world-famous characters featured in numerous animated short
11 films, video games, feature length motion pictures and television programs produced
12 over a period of more than seventy years, including, but not limited to, Mickey
13 Mouse, Minnie Mouse, Pluto, Goofy, Winnie the Pooh, Tigger, various characters
14 from the motion picture *Toy Story* and Handy Manny (from the television series
Handy Manny) (hereinafter referred to as the "DEI Characters").

16 d. The business associated with products sold in the United States
17 which use the DEI Characters is substantial. The appearance and other features of
18 the DEI Characters are inherently distinctive and serve to identify DEI and its
19 licensees as the source of products bearing the DEI Characters. The design,
20 configuration and distinctive features of the DEI Characters and other DEI
21 copyrighted works, and of works related thereto (hereinafter individually and
22 collectively referred to as "DEI's Copyrighted Designs"), are wholly original with
23 DEI and, as fixed in various tangible media, including merchandise, are
24 copyrightable subject matter under the United States Copyright Act, 17 U.S.C.,
25 Sections 101, *et seq.* DEI is the owner of DEI's Copyrighted Designs and, as
26 featured on in connection with various merchandise, constitute copyrightable subject
27 matter under the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*

1 e. DEI, and its predecessors in interest, including Walter E. Disney,
2 have complied in all respects with the laws governing copyright and have secured the
3 exclusive rights and privileges in and to the copyrights to DEI's Copyrighted
4 Designs, and DEI owns one or more certificates of registration for works in which
5 each of DEI's Copyrighted Designs appear. A representative list of copyright
6 registrations for DEI's Copyrighted Designs is attached hereto as Exhibit A.

7 f. Products featuring DEI's Copyrighted Designs which are
8 manufactured, sold and distributed by DEI or under its authority have been
9 manufactured, sold and distributed in conformity with the provisions of the copyright
10 laws. DEI and those acting under its authority have complied with their obligations
11 under the copyright laws, and DEI, in its own right or as successor-in-interest, has at
12 all times been and still is the sole proprietor or otherwise authorized to enforce all
13 right, title and interest in and to the copyrights in each of DEI's Copyrighted
14 Designs.

15 g. DEI is the owner of world famous registered marks which serve
16 to distinguish DEI products ("DEI's Trademarks"). Some of those trademarks have
17 been used continuously for over seventy years. Each year DEI spends substantial
18 amounts to develop and maintain the considerable goodwill it enjoys in its
19 trademarks and in its reputation for high quality. A representative list of trademark
20 registrations for DEI's Trademarks is attached hereto as Exhibit B.

21 h. DEI's Trademarks are all valid, extant and in full force and effect.
22 DEI's Trademarks are all exclusively owned by DEI. DEI has continuously used
23 each of DEI's Trademarks from the registration date, or earlier, until the present and
24 at all times relevant to the claims alleged in this Complaint.

25 i. As a result of advertising and sales, together with longstanding
26 consumer acceptance, DEI's Trademarks identify DEI's products and authorized
27 sales of these products. DEI's Trademarks have each acquired secondary meaning in
28 the minds of consumers throughout the United States and the world. DEI's

1 Characters, Copyrighted Designs and Trademarks are collectively referred to herein
2 as DEI's Properties.

3 6. DC Comics is a New York General Partnership consisting of E.C.
4 Publications, Inc. and Warner Communications Inc., having its principal place of
5 business in New York, New York.

6 a. DC is engaged in the business of publishing comic magazines and
7 is among the most well-known and successful publishers of comic magazines in the
8 world. It has created and published highly successful and well-known characters
9 including but not limited to BATMAN, ROBIN, THE JOKER, SUPERMAN,
10 SUPER GIRL and WONDER WOMAN (hereinafter individually and collectively
11 referred to as the "DC Characters").

12 b. A significant aspect of DC Comics' business is the merchandising
13 and licensing of distinctive trademarks and copyrights associated with its highly
14 successful and well-known DC Characters. Of these, two of the most successful
15 characters have been Batman and Superman.

16 c. Batman first appeared in the May 1939 issue of "Detective
17 Comics." Numerous related characters, including "Robin," "The Riddler," "Two
18 Face," "Catwoman," "The Penguin" and "The Joker" as well as other popular
19 characters associated with Batman were soon introduced to the public. (Batman and
20 the related characters are hereinafter collectively referred to as the "Batman
21 Characters").

22 d. Superman appeared at least as early as 1938. Numerous related
23 characters, including "Clark Kent," "Lois Lane," and "Lex Luthor" as well as other
24 popular characters associated with Superman were soon introduced to the public.
25 (Superman and the related characters are hereinafter collectively referred to as the
26 "Superman Characters").

27 e. Since their introductions, the Batman Characters and Superman
28 Characters have been featured in many formats, other than comic books, including

1 movie serials, newspaper comic strips, radio shows, animated television series, live
2 action television series, animated motion pictures, live action motion picture and
3 theatrical presentations, among others. Television series featuring the Batman
4 Characters and the Superman Characters have since been in continuous television
5 syndication in the United States and abroad for many decades. These appearances
6 have expanded the popularity of the Batman Characters and the Superman
7 Characters beyond the comic book medium and market.

8 f. The Batman Characters have also been featured in the 1989
9 motion picture entitled *BATMAN* (the “1989 Film”), the 1992 motion picture entitled
10 *BATMAN RETURNS* (the “1992 Film”), the 1995 motion picture entitled *BATMAN*
11 *FOREVER* (the “1995 Film”), the 1997 motion picture entitled *BATMAN & ROBIN*
12 (the “1997 Film”), the 2005 motion picture entitled *BATMAN BEGINS* (the “2005
13 Film”), the 2008 motion picture entitled *THE DARK KNIGHT* (the “2008 Film”) and
14 the most recent motion picture entitled *THE DARK KNIGHT RISES* (“2012 Film”).

15 g. The 1989 Film generated over \$251 million dollars in domestic
16 box office receipts. The 1992 Film generated over \$162 million dollars in domestic
17 box office receipts. The 1995 Film generated over \$184 million dollars in domestic
18 box office receipts. The 1997 Film generated over \$107 million dollars in domestic
19 box office receipts. The 2005 Film generated over \$205 million dollars in domestic
20 box office receipts. And the 2008 Film generated over \$533 million dollars in
21 domestic box office receipts. The *BATMAN* motion pictures have resulted in
22 domestic gross box office receipts in over a billion dollars, not to mention additional
23 revenues from syndication rights and home video distribution. The *BATMAN* motion
24 pictures have proven to be among the most successful licensing and merchandising
25 ventures of all time, with gross retail sales of associated licensed merchandise
26 exceeding \$1,000,000,000.

27 h. The Superman Characters have also appeared in numerous
28 theatrical motion pictures since their introduction. The most recent motion picture

1 featuring the Superman Characters, *SUPERMAN RETURNS*, was released on June
2 28, 2006, and has generated more than \$200 million dollars in domestic box office
3 receipts and more than \$190 million dollars in international box office receipts. The
4 Superman Characters have also been featured in numerous other theatrical motion
5 pictures, including a series of four motion pictures starring Christopher Reeve. Such
6 motion pictures include *SUPERMAN THE MOVIE*, *SUPERMAN II*, *SUPERMAN III*
7 and *SUPERMAN IV: THE QUEST FOR PEACE*, all of which collectively generated
8 over \$750 million dollars in worldwide box office receipts.

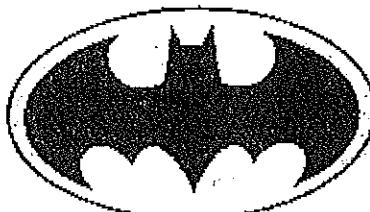
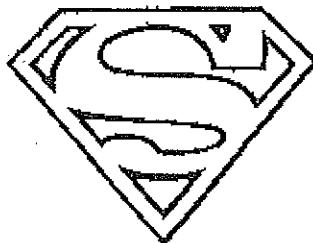
9 i. Revenues generated from products and services using the DC
10 Characters sold in the United States are substantial. The appearance and other
11 features of the DC Characters are inherently distinctive and serve to identify DC
12 Comics and its licensees as the source of products bearing the DC Characters. The
13 design, configuration and distinctive features of the DC Characters and other DC
14 Comics' copyrighted works, and of works related thereto (hereinafter individually
15 and collectively referred to as the "DC Comics' Copyrighted Designs"), are wholly
16 original with DC Comics and, as fixed in various tangible media, including, without
17 limitation, costumes and related merchandise, are copyrightable subject matter under
18 the United States Copyright Act, 17 U.S.C., §§ 101, et seq. DC Comics is the owner
19 of DC Comics' Copyrighted Designs and, as featured on in connection with various
20 merchandise, these designs constitute copyrightable subject matter under the
21 Copyright Act of 1976, 17 U.S.C. §§ 101, et seq.

22 j. DC Comics has complied in all respects with the laws governing
23 copyright and has secured the exclusive rights and privileges in and to the copyrights
24 to the DC Comics' Copyrighted Designs, and DC Comics owns one or more
25 certificates of registration for works in which each of the DC Comics' Copyrighted
26 Designs appear. A representative list of copyright registrations for the DC Comics'
27 Copyrighted Designs is attached as Exhibit "C."

1 k. Products featuring the DC Comics' Copyrighted Designs
2 manufactured, sold and distributed by DC Comics or under its authority have been
3 manufactured, sold and distributed in conformity with the provisions of the copyright
4 laws. DC Comics and those acting under its authority have complied with their
5 obligations under the copyright laws and DC Comics has at all times been and still is
6 the sole proprietor or otherwise authorized to enforce all right, title and interest in
7 and to the copyrights in each of the DC Comics' Copyrighted Designs.

8 l. DC Comics owns all right, title and interest in and to and holds
9 exclusive right to develop, manufacture, market and sell product bearing the
10 trademarks, trade names, service marks, artwork, characters and other distinctive
11 elements for and incorporating the DC Characters.

12 m. DC Comics is the owner of world famous registered marks which
13 serve to distinguish DC products (hereinafter individually and collectively referred to
14 as the "DC Comics Trademarks"). Each year DC Comics spends millions of dollars
15 to develop and maintain the considerable good will it enjoys in its trademarks and in
16 its reputation for high quality. A representative list of trademark registrations for the
17 DC Comics Trademarks is attached as Exhibit "D," including, but not limited to, the
18 trademark registration of the Superman "S in Shield Logo" and the Batman "Bat
19 Emblem" devices are depicted below:



25 n. The DC Comics Trademarks are all valid, extant and in full force
26 and effect. The DC Comics Trademarks are all exclusively owned by DC Comics.
27 DC Comics has continuously used each of the DC Comics Trademarks from the
28

1 registration date, or earlier, until the present and at all times relevant to the claims
2 alleged in this Complaint.

3 o. DC has granted and transferred to its related companies, Warner
4 Bros. Consumer Products Inc., and WB Studio Enterprises Inc., subsidiaries of
5 Warner Bros. Entertainment Inc., the right to supervise in the United States the
6 merchandising and licensing of the copyrighted elements, trademarks, trade names
7 and service marks incorporated in or associated with the DC Characters. Currently,
8 Plaintiffs have numerous active license agreements in the United States. These
9 agreements provide for the authorized use of the DC Characters on products and in
10 connection with services, including costumes and related merchandise.

11 p. As a result of advertising and sales, together with longstanding
12 consumer acceptance, the DC Comics Trademarks identify DC Comics' products
13 and authorized sales of these products. The DC Comics Trademarks have each
14 acquired secondary meaning in the minds of consumers throughout the United States
15 and the world. DC Comics' Copyrighted Designs and the DC Comics Trademarks
16 are collectively referred to herein as "DC Comics' Properties."

17 7. Plaintiff Sanrio, Inc. ("Sanrio") is a corporation, duly organized and
18 existing under the laws of the State of California, having its principal place of
19 business in South San Francisco, California. Sanrio is a wholly owned subsidiary of
20 Sanrio Company, Ltd. Sanrio Company, Ltd. is a corporation organized under the
21 laws of Japan, having its principal place of business in Tokyo, Japan (hereinafter
22 referred to as "Sanrio Company").

23 a. For more than fifty years, Sanrio Company has been engaged in
24 the business of manufacturing, distributing and selling a wide range of products
25 including, without limitation, character artwork created, developed and designed by
26 Sanrio Company for use by children and young adults. Certain of the characters and
27 designs have achieved such global fame and popularity that Sanrio Company has
28 produced and distributed television programming for children based on the character

1 artwork. One such television program is the animated television series entitled *Hello
2 Kitty*.

3 b. A significant source of revenue for Sanrio Company is the
4 merchandising and licensing of distinctive elements bearing character artwork,
5 including, but not limited to, Hello Kitty, Hangyodon, Chococat, Osaru No
6 Monkichi, Bad Badtz-Maru, KeroKeroKeroppi, My Melody, Dear Daniel
7 (hereinafter individually and collectively referred to as the “Sanrio Company
8 Characters”).

9 c. The revenue from products using the Sanrio Company Characters
10 sold in the United States is substantial. The appearance and other features of the
11 Sanrio Company Characters are inherently distinctive and serve to identify Sanrio
12 Company as the source of products bearing the Sanrio Company Characters. The
13 design, configuration and distinctive features of the Sanrio Company Characters and
14 other Sanrio Company copyrighted works, and of works related thereto (hereinafter
15 individually and collectively referred to as “Sanrio Company’s Copyrighted
16 Designs”) are wholly original with Sanrio Company and, as fixed in various tangible
17 media including, without limitation, merchandise, are copyrightable subject matter
18 under the United States Copyright Act, 17 U.S.C., § 101, *et seq.* Sanrio Company is
19 the owner of Sanrio Company’s Copyrighted Designs and, as featured on and in
20 connection with various merchandise, these designs constitute copyrightable subject
21 matter under the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.*

22 d. Sanrio Company has complied in all respects with the laws
23 governing copyright and has secured the exclusive rights and privileges in and to the
24 copyrights to Sanrio Company’s Copyrighted Designs, and Sanrio Company owns
25 one or more certificates of registration for works in which each of Sanrio Company’s
26 Copyrighted Designs appear. A representative list of copyright registrations for
27 Sanrio Company’s Copyrighted Designs is attached hereto as Exhibit “E.” Sanrio
28 Company’s Copyrighted Designs manufactured, sold, and distributed by Sanrio

1 Company or under its authority have been manufactured, sold, and distributed in
2 conformity with the provisions of the copyright laws. Sanrio Company and those
3 acting under its authority have complied with their obligations under the copyright
4 laws. Sanrio, as the exclusive United States licensee for Sanrio Company, is
5 authorized to enforce all right, title, and interest in and to the copyrights in each of
6 Sanrio Company's Copyrighted Designs.

7 e. Sanrio Company owns all right, title, and interest in and to and
8 holds exclusive rights to develop, manufacture, market, and sell products bearing the
9 trademarks, trade names, service marks, artwork, characters, and other distinctive
10 elements for and incorporating the Sanrio Company Characters.

11 f. Sanrio Company is the owner of world famous registered marks,
12 which serve to distinguish Sanrio Company products (hereinafter individually and
13 collectively referred to as the "Sanrio Company Trademarks"). Some of those
14 trademarks have been used continuously for more than twenty-five years. Each year
15 Sanrio Company spends millions of dollars to develop and maintain the considerable
16 good will it enjoys in its trademarks and in its reputation for high quality. A
17 representative list of trademark registrations for the Sanrio Company Trademarks is
18 attached hereto as Exhibit "F."

19 g. The Sanrio Company Trademarks are all valid; extant, and in full
20 force and effect. Sanrio Company's Trademarks are exclusively owned by Sanrio
21 Company. Sanrio Company has continuously used each of the Sanrio Company
22 Trademarks from the registration date, or earlier, until the present and at all times
23 relevant to the claims alleged in this Complaint.

24 h. As a result of advertising and sales, together with longstanding
25 consumer acceptance, the Sanrio Company Trademarks identify Sanrio Company's
26 products and authorized sales of these products. The Sanrio Company Trademarks
27 have each acquired secondary meaning in the minds of consumers throughout the
28 United States and the world. Sanrio, as the exclusive U.S. licensee for Sanrio

1 Company, is authorized to enforce all right, title, and interest in and to the
2 trademarks in each of the Sanrio Company Trademarks.

3 i. Through Sanrio, Sanrio Company has authorized and licensed the
4 manufacture and sale of various different types of product, which bear the Sanrio
5 Copyrighted Designs and Trademarks, including, but not limited to costumes and
6 related merchandise.

7 9. The DEI Characters, DC Characters, and Sanrio Company Characters
8 are collectively referred to herein as "Plaintiffs' Characters." DEI's Copyrighted
9 Designs, DC Comics' Copyrighted Designs, and the Sanrio Company Copyrighted
10 Designs are collectively referred to herein as "Plaintiffs' Copyrighted Designs."
11 The DEI Trademarks, DC Comics Trademarks, and Sanrio Company Trademarks
12 are collectively referred to herein as "Plaintiffs' Trademarks." Plaintiffs'
13 Copyrighted Designs and Plaintiffs' Trademarks are collectively referred to herein as
14 "Plaintiffs' Properties."

15 **D. Defendants**

16 10. Defendant Jason Lancaster is an individual and d/b/a
17 www.partyanimalsoc.com ("Lancaster") and is a resident of the County of Orange
18 and the State of California. Plaintiffs are informed and believe, and upon that basis
19 allege, that Lancaster does business through the website, including but not limited to,
20 www.partyanimalsoc.com. Plaintiffs are further informed and believe, and based
21 thereon allege, that Lancaster had the right and ability to supervise or control the
22 infringing activity alleged herein and that Lancaster had a direct financial interest in
23 such activity. In addition or alternatively, Lancaster had knowledge or reason to
24 know of the infringing activity and took actions which contributed to such activity.

25 11. Defendant The Party Animals, LLC ("TPA") is a California
26 Corporation, with its principal place of business in the city of Marina Del Rey,
27 California. Plaintiffs are informed and believe that TPA does business through the
28 website located at the domain name www.partyanimalsoc.com. TPA is subject to the

jurisdiction of this Court and is manufacturing, promoting, distributing, advertising and selling unlicensed and counterfeit costumes and related merchandise which infringe Plaintiffs' intellectual properties within this judicial district.

12. Upon information and belief, Does 1 – 10 are either entities or individuals who are residents of or present in this judicial district, and are subject to the jurisdiction of this Court. Upon information and belief, Does 1 – 10 are principals or supervisory employees of the named defendants, suppliers of the named defendants or other entities or individuals who are manufacturing, distributing, selling and/or offering for sale character costumes and related merchandise in this judicial district which infringes some or all of Plaintiffs' intellectual properties. The identities of the various Does are unknown to Plaintiffs at this time. The Complaint will be amended to include the names of such individuals when identified. The named defendants and Does 1 – 10 are collectively referred to herein as "Defendants."

COUNT I - COPYRIGHT INFRINGEMENT

13. Plaintiffs bring the following claim of copyright infringement against the Defendants and incorporate by reference allegations 1 through 12 above.

14. Defendants have manufactured, distributed, sold, offered for sale, or rented unauthorized or counterfeit character costumes and related merchandise bearing the copyrighted properties of the Plaintiffs. Itemized lists of some, but not all, of said copyrighted properties infringed upon appear in Exhibits "A," "C," and "E".

15. Defendants have never been authorized by the Plaintiffs to distribute the Plaintiffs' copyrighted properties, nor have the Plaintiffs ever authorized, licensed, or in any manner allowed the Defendants the right to manufacture, distribute, sell, offer for sale, or rent any merchandise including, but not limited to, character costumes or related merchandise which bear any of said copyrighted properties.

1 16. Defendants have manufactured, distributed, sold, offered for sale, or
2 rented unauthorized or counterfeit character costumes and related merchandise which
3 incorporate the Plaintiffs' copyrighted properties, in direct violation of the Plaintiffs'
4 copyrights.

5 17. Defendants have manufactured, distributed, sold, offered for sale, or
6 rented counterfeit or unauthorized character costumes or other merchandise bearing
7 the Plaintiffs' copyrighted properties. Defendants committed their acts with actual
8 as well as constructive knowledge of the Plaintiffs' exclusive rights, and their actions
9 have contributed to the infringing, copying, duplication, sale, offer for sale, or rental
10 of counterfeit copies of the Plaintiffs' copyrighted properties. Each act by the
11 Defendants that infringes one of the Plaintiffs' copyrights is the basis for a separate
12 claim against the Defendants under the Copyright Act.

13 18. Upon information and belief, Defendants' acts as alleged are willful
14 infringements of and have irreparably harmed the Plaintiffs' copyrights and
15 exclusive rights and threaten further infringements and further irreparable harm to
16 Plaintiffs' copyrights and exclusive rights. Further harm and injury to Plaintiffs is
17 imminent, and the Plaintiffs are without an adequate remedy at law with respect to
18 such harm and injury. Unless Defendants' acts are enjoined and the illicit
19 counterfeitors of the Plaintiffs' copyrighted properties are stopped, it is highly
20 probable that the Defendants, or others under Defendants' direction, will
21 manufacture, distribute, sell, offer for sale, or rent additional counterfeit character
22 costumes or other merchandise which bear the Plaintiffs' copyrighted properties
23 causing further irreparable injury to Plaintiffs.

24 19. Defendants have obtained gains, profit, and advantages as a result of
25 their wrongful acts noted above.

26 20. The Plaintiffs are entitled, at their option, to statutory damages as
27 provided by 17.U.S.C. § 504 in lieu of actual damages and the Defendants' profits.
28

1 **COUNT II - TRADEMARK INFRINGEMENT AND TRADEMARK**
2 **COUNTERFEITING**

3 21. Plaintiffs bring the following claim of trademark infringement against
4 the Defendants and incorporate by reference paragraphs 1 through 20 above.

5 22. Plaintiffs own or are licensees of the exclusive rights to those
6 trademarks indexed on Exhibits "B," "D," and "F". All of the trademark
7 registrations are in full force and effect and are owned by the Plaintiffs or Plaintiffs'
8 licensors. Many of the trademarks are incontestable pursuant to 15 U.S.C. § 1065.

9 23. Plaintiffs, or those under their authority, manufacture and distribute all
10 of their advertising and products in conformity with the provisions of the United
11 States trademark law.

12 24. Notwithstanding the Plaintiffs' or their licensors' well-known and prior
13 common law and statutory rights in the trademarks, Defendants have, with actual and
14 constructive notice of the Plaintiffs' federal registration rights and long after the
15 Plaintiffs' established their rights, adopted and used the trademarks in conjunction
16 with the sale of character costumes and related merchandise in the State of California
17 and interstate commerce.

18 25. Defendants have distributed, sold, offered for sale, or rented character
19 costumes and related merchandise bearing Plaintiffs' trademarks without Plaintiffs'
20 authorization. Defendants' distribution, sale, offer for sale, or rental of character
21 costumes and related merchandise bearing Plaintiffs' trademarks in California and
22 interstate commerce has and will cause the likelihood of confusion, deception, and
23 mistake in that the buying public will conclude that the products sold by the
24 Defendants are authorized, sponsored, approved, or associated with the Plaintiffs.

25 26. Said acts of infringement will cause irreparable injury to the Plaintiffs if
26 the Defendants are not restrained by the Court from further violation of the
27 Plaintiffs' rights as the Plaintiffs have no adequate remedy at law.

28 27. The Plaintiffs have suffered damages as a result of the Defendants' acts.

1 28. Defendants' use in commerce of Plaintiffs' trademarks in conjunction
2 with the sale of character costumes and related merchandise is an infringement of
3 Plaintiffs' registered trademarks in violation of 15 U.S.C. § 1114(1).

4 29. Defendants committed the acts alleged herein intentionally,
5 fraudulently, maliciously, willfully, wantonly, and oppressively with the intent to
6 injure the Plaintiffs and their businesses.

7 30. The unlicensed character costumes bearing the Plaintiffs' trademarks
8 that the Defendants' sold, distributed, offered for sale, or rented constitutes a
9 counterfeit product pursuant to 15 U.S.C. § 1116(d).

10 **COUNT III - UNFAIR COMPETITION UNDER THE LANHAM ACT**

11 31. Plaintiffs bring the following claim of unfair competition against
12 Defendants and incorporate by reference the allegations set forth in paragraphs 1
13 through 30 above.

14 32. As a direct result of the Plaintiffs' longstanding use, sales, advertising,
15 and marketing, Plaintiffs' trademarks have acquired a secondary and distinctive
16 meaning among the public who have come to identify Plaintiffs' trademarks listed on
17 Exhibits "B," "D," and "F" with the Plaintiffs and their respective products.

18 33. The unauthorized and counterfeit character costumes and related
19 merchandise that the Defendants have sold and distributed exactly duplicates and
20 appropriated Plaintiffs' trademarks and deludes and confuses the public into
21 believing that the Plaintiffs approved, authorized, or sponsored the character
22 costumes and related merchandise sold, offered for sale, rented, or distributed by the
23 Defendants.

24 34. Defendants, by misappropriating and using the likenesses of Plaintiffs'
25 trademarks in connection with the sale or rental of character costumes and related
26 merchandise, is misrepresenting and will continue to misrepresent and falsely
27 describe to the general public the origin and sponsorship of their products and/or
28 services. Defendants have caused such products to enter into interstate commerce

1 willfully with full knowledge of the falsity of the designation of their origin and
2 description and representation in an effort to mislead the purchasing public into
3 believing that their products are authorized or emanate from the Plaintiffs.

4 35. These acts constitute a violation of Section 43 of the Lanham Act, 15
5 U.S.C. § 1125.

6 36. The Defendants have obtained gains, profits, and advantages as a result
7 of their unlawful acts.

8 37. The Plaintiffs have suffered monetary damages as a result of the
9 Defendants' acts.

10 **COUNT IV - UNFAIR COMPETITION UNDER CALIFORNIA'S COMMON**

11 **LAW**

12 38. Plaintiffs bring the following claim of unfair competition against
13 Defendants and incorporate by reference the allegations set forth in paragraphs 1
14 through 37 above.

15 39. Plaintiffs have expended significant sums of money in advertising and
16 marketing products featuring its products and in creating a consumer demand for
17 such products in California and elsewhere in the United States. Consequently, these
18 products have become widely known and accepted.

19 40. Defendants have distributed, rented and/or sold unauthorized and
20 counterfeit character costumes and related merchandise bearing exact copies of
21 Plaintiffs' trademarks in California, thereby passing them off as products authorized
22 or distributed by the Plaintiffs.

23 41. Defendants have knowingly and willfully appropriated Plaintiffs'
24 trademarks in an effort to create the impression that the Defendants' counterfeit
25 products are sanctioned by the Plaintiffs and to misappropriate all of the goodwill
26 associated with Plaintiffs' trademarks.

27 42. The Defendants' acts constitute unfair competition and will, unless
28 enjoined by this Court, result in the destruction or dilution of the goodwill in

Plaintiffs' trademarks and of Plaintiffs' valuable trademark rights to the unjust enrichment of the Defendants.

43. The unauthorized products that are sold by the Defendants are calculated and likely to deceive and mislead the purchasers who buy them in the belief that they originate with or are authorized by the Plaintiffs.

44. The continued passing off by the Defendants of such unauthorized products as if such products originated from the Plaintiffs has caused and, unless restrained, will continue to cause serious and irreparable injury to the Plaintiffs.

45. The Plaintiffs have no adequate remedy at law and suffers irreparable harm as a result of the Defendants' acts.

46. The Plaintiffs have suffered damages as a result of the Defendants' acts.

47. Defendants committed the alleged acts intentionally, fraudulently, maliciously, willfully, wantonly, and oppressively with the intent to injure the Plaintiffs' and their businesses.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand entry of a judgment against the defendant as follows:

1. Permanent injunctive relief restraining the Defendants, their officers, agents, servants, employees, attorneys, and all those in active concert or participation with them from:

a. Further infringing Plaintiffs' copyrighted properties, trademarks, and licensed trademarks by manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, renting, advertising, promoting, displaying, or otherwise disposing of any products not authorized by the Plaintiffs including, but not limited to, character costumes and related merchandise bearing any simulation, reproduction, counterfeit, copy, or colorable imitation of any of Plaintiffs' trademarks ("Unauthorized Products");

1 b. Using any simulation, reproduction, counterfeit, copy, or
2 colorable imitation of any of Plaintiffs' copyrighted properties, trademarks, and
3 licensed trademarks in the promotion, advertisement, display, sale, offer for sale,
4 rental, manufacture, production, circulation, or distribution of Unauthorized Products
5 in such fashion as to relate or connect, or tend to relate or connect, such products in
6 any way to the Plaintiffs or to any goods sold, manufactured, sponsored, or approved
7 by or connected with the Plaintiffs;

8 c. Making any statement or representation whatsoever, or using any
9 false designation of origin or false description, or performing any act that can or is
10 likely to lead the trade or public, or individual members thereof, to believe that any
11 products manufactured, distributed, or sold by the Defendants is in any manner
12 associated or connected with the Plaintiffs, or are sold, manufactured, licensed,
13 sponsored, approved, or authorized by the Plaintiffs;

14 d. Engaging in any other activity constituting unfair competition
15 with any of the Plaintiffs, or constituting an infringement of any of Plaintiffs'
16 trademarks or of Plaintiffs' rights in, or to use or to exploit said trademarks, or
17 constituting any dilution of any of the Plaintiffs' names, reputations, or goodwill;

18 e. Effecting assignments or transfers, forming new entities or
19 associations or using any other device for the purpose of circumventing or otherwise
20 avoiding the prohibitions set forth in Subparagraphs a. through d.;

21 f. Secreting, destroying, altering, removing, or otherwise dealing
22 with the Unauthorized Products or any books or records that may contain any
23 information relating to the importing, manufacturing, producing, distributing,
24 circulating, selling, marketing, offering for sale, renting, advertising, promoting, or
25 displaying of all unauthorized products that infringe any of the Plaintiffs' trademarks
26 or copyrights; and

27 g. From aiding, abetting, contributing to, or otherwise assisting
28 anyone from infringing upon any of the Plaintiffs' trademarks or copyrights.

1 2. Directing that the Defendants deliver for destruction all Unauthorized
2 Products including character costumes, labels, signs, prints, packages, dyes,
3 wrappers, receptacles, and advertisements in their possession or under their control
4 bearing any of Plaintiffs' trademarks or any simulation, reproduction, counterfeit,
5 copy, or colorable imitation thereof, and all plates, molds, heat transfers, screens,
6 matrices, and other means of making the same.

7 3. In order to give practical meaning effect to any preliminary and
8 permanent injunctions, the domain name(s) be ordered immediately transferred by
9 the Defendants, the Registry and the Registrars to Plaintiffs' control.

10 4. Directing that the Defendants report to this Court within thirty (30) days
11 after a Permanent Injunction is entered to show its compliance with paragraphs 1 and
12 2 above.

13 5. Directing such other relief as the Court may deem appropriate to
14 prevent the trade and public from gaining the erroneous impression that the Plaintiffs
15 authorized or are related in any way to any products manufactured, sold, rented, or
16 otherwise circulated or promoted by the Defendants.

17 6. Awarding to the Plaintiffs from the Defendants, as a result of the
18 Defendants' sale of Unauthorized Products bearing the Plaintiffs' trademarks, three
19 times the Plaintiffs' damages and three times the Defendants' profits, after an
20 accounting, or statutory damages, should the Plaintiffs opt for such relief, consisting
21 of \$200,000.00 for each of the Plaintiffs' trademarks infringed upon by the
22 Defendants, and to the extent this Court concludes such infringement was willful,
23 \$2,000,000.00 for the Plaintiffs' trademarks infringed upon by the Defendants
24 pursuant to 15 U.S.C. § 1114 and § 1117.

25 7. Awarding to each Plaintiff from the Defendants selling Unauthorized
26 Products three times its damages therefrom and three times Defendants' profits
27 therefrom, after an accounting, pursuant to 15 U.S.C. § 1125(a) and § 1117.
28

8. That Plaintiffs be awarded from each Defendant found to be in violation of their copyrighted properties, the Defendants' profits, or at Plaintiffs' election, an award of statutory damages pursuant to 15 U.S.C. § 504, of no less than Seven Hundred Fifty Dollars (\$750) nor more than Thirty Thousand Dollars (\$30,000) per copyrighted property infringed upon by each Defendant, at the Court's discretion, or should this Court find that such infringement was willful, that this Court, pursuant to its discretion, award statutory damages of up to One Hundred Fifty Thousand Dollars (\$150,000) for each copyrighted property infringed upon by each such Defendant.

9. Awarding to the Plaintiffs its reasonable attorneys' fees and investigative fees pursuant to 15 U.S.C. § 1117.

10. Awarding to the Plaintiffs their costs in bringing this action.

11. Awarding punitive damages to the Plaintiffs for the Defendants' willful acts of unfair competition under California's common law.

12. Awarding other such relief to the Plaintiffs as this Court deems just.

Dated: August 24, 2012

J. Andrew Coombs, A Professional Corp.

By:

J. Andrew Coombs
Annie S. Wang

Attorneys for Plaintiffs Disney Enterprises,
Inc., DC Comics, and Sanrio, Inc.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs Disney Enterprises, Inc., DC Comics, and Sanrio, Inc. hereby demand a trial by jury of all issues so triable.

DATED: August 24, 2012

J. Andrew Coombs, A Professional Corp.

Bix. 100. A

J. Andrew Coombs
Associate

J. Andrew Gooch

Attorneys for Plaintiffs Disney Enterprises,
Inc., DC Comics, and Sanrio, Inc.

EXHIBIT ADEI'S COPYRIGHTED DESIGNS

Copyright Registration	Title of Work (Character)	Type of Work
VA 58 937	Mickey - 1 (Mickey Mouse)	Model Sheet
VA 58 938	Minnie - 1 (Minnie Mouse)	Model Sheet
Gp 80 184	Donald Duck	Publications Model Sheet
VA 58 933	Daisy - 1 (Daisy Duck)	Model Sheet
VA 58 936	Goofy -1 (Goofy)	Model Sheet
Gp 80 192	Pluto	Publications Model Sheet
VAu 64 814	Baby Mickey	Model Sheet
VAu 64 814	Baby Minnie	Model Sheet
VAu 73 216	Baby Donald Duck	Model Sheet
VAu 73 217	Baby Daisy Duck	Model Sheet
VAu 83 225	Baby Goofy	Model Sheet
VAu 73 219	Baby Pluto	Model Sheet
R 48 971	Disney's Uncle Scrooge in Only a Poor Old Man	Comic Strip
RE 424 728	Walt Disney's Ludwig von Drake	Comic Strip
Gp 105 126	Horace Horsecollar	Model Sheet
R 567 615	Chip	Model Sheet
R 567 614	Dale	Model Sheet
VA 184 345	Huey, Dewey & Louie -1	Model Sheet
Gp 105 128	Clarabelle Cow	Model Sheet
RE 636 587	Winnie the Pooh and the Honey Tree	Motion Picture
RE 718 378	Winnie the Pooh and the Blustery Day	Motion Picture
VA 58 940	Pooh - 1 (Winnie the Pooh)	Model Sheet
Gp 81 528	Rabbit	Publications Model Sheet
Gp 81 528	Owl	Publications Model Sheet
Gp 85 651	Kanga and Roo	Publications Model Sheet
Gp 81 528	Eeyore	Publications Model Sheet
Gp 81 528	Piglet	Publications Model Sheet
Gp 81 528	Gopher	Publications Model Sheet
Gp 81 527	Tigger	Publications Model Sheet
R 354 235	Snow White and the Seven Dwarfs	Motion Picture
R 346 870	Bashful	Drawings
R 346 869	Doc	Drawings
R 346 875	Dopey	Drawings
R 346 876	Grumpy	Drawings

1	R 346 871	Happy	Drawings
2	R 346 874	Sleepy	Drawings
3	R 346 873	Sneezy	Drawings
4	R 346 872	Snow White	Drawings
5	R 346 868	Snow White "Witch"	Drawings
6	R 406 910	Pinocchio	Motion Picture
7	Gp 80 186	Pinocchio	Publications Model Sheet
8	Gp 80 188	Jiminy Cricket	Publications Model Sheet
9	R 427 860	Fantasia	Motion Picture
10	R 433 627	The Reluctant Dragon	Motion Picture
11	R 442 538	Dumbo	Motion Picture
12	R 428 428	Dumbo Suggestions for Dumbo	Drawing
13	R 428 420	Mother Elephant Suggestions for "Dumbo"	Drawing
14	R 428 430	Dumbo Ringmaster Suggestions 1348	Drawing
15	R 428 427	Dumbo - Stork Suggestions	Drawing
16	R 428 426	Timothy Mouse Suggestions	Drawing
17	R 428 432	Dumbo "Miscellaneous Crows" - 2006	Drawing
18	R 458 260	Bambi	Motion Picture
19	R 433 645	Bambi - Bambi	Drawing
20	R 433 630	Bambi - Final Thumper Model - 2002	Drawing
21	R 433 631	Bambi - Skunk Model - 2002	Drawing
22	R 433 636	Bambi - Owl and Stag Models	Drawing
23	R 433 632	Faline "Adolescent Age"	Drawing
24	R 433 633	Bambi's Mother	Drawing
25	R 467 541	Saludos Amigos	Motion Picture
26	R 464 785	Joe Carioca	Drawing
27	R 516 560	The Three Caballeros	Motion Picture
28	R 550 316	Make Mine Music	Motion Picture
29	R 557 922	Song of the South	Motion Picture
30	R 548 629	Brer Rabbit	Drawing
31	R 548 626	Brer Bear	Drawing
32	R 577 489	Fun and Fancy Free	Motion Picture
33	R 605 180	Melody Time	Motion Picture
34	R 636 303	The Adventures of Ichabod & Mr. Toad	Motion Picture
35	R 648 396	Cinderella	Motion Picture
36	R 632 319	Cinderella	Copyright Booklet
37	R 632 319	Drizella	Copyright Booklet
38	R 632 319	Anastasia	Copyright Booklet
39	R 632 319	Stepmother	Copyright Booklet
40	R 632 319	Fairy Godmother	Copyright Booklet
41	R 632 319	Prince	Copyright Booklet
42	R 632 319	Bruno, the Dog	Copyright Booklet
43	R 632 319	Lucifer, the Cat	Copyright Booklet
44	R 632 319	Jaq and Gus	Copyright Booklet
45	RE 27 746	Alice in Wonderland	Motion Picture
46	VA 58 920	Alice - 1 (Alice)	Model Sheet
47	VA 58 919	Alice - 2 (The White Rabbit)	Model Sheet
48	VA 58 921	Alice - 3 (Queen of Hearts)	Model Sheet

1	VA 58 922	Alice - 4 (Cheshire Cat)	Model Sheet
2	VA 58 923	Alice - 5 (Caterpillar)	Model Sheet
3	VA 58 924	Alice - 6 (Tweedledee and Tweedledum)	Model Sheet
4	VA 58 922	March Hare	Model Sheet
5	VA 58 922	Mad Hatter	Model Sheet
6	RE 64 027	Peter Pan	Motion Picture
7	RE 66 285	Peter Pan	Coloring Book
8	RE 66 285	Tinkerbell	Coloring Book
9	RE 66 285	Captain Hook	Coloring Book
10	RE 66 285	Mr. Smee	Coloring Book
11	RE 66 285	Nana	Coloring Book
12	RE 162 852	Lady and the Tramp	Motion Picture
13	RE 101 764	Lady	Previews of Pictures
14	RE 101 764	Tramp	Previews of Pictures
15	RE 296 296	Sleeping Beauty	Motion Picture
16	RE 246 671	Princess Aurora	Book
17	RE 246 671	Prince Phillip	Book
18	RE 246 671	Maleficent/Dragon	Book
19	RE 370 901	One Hundred and One Dalmatians	Motion Picture
20	RE 546 478	The Sword in the Stone	Motion Picture
21	RE 557 357	Archimedes	Copyright Booklet
22	RE 557 357	Merlin	Copyright Booklet
23	RE 557 357	Wart/Arthur	Copyright Booklet
24	RE 557 357	Madame Mim	Copyright Booklet
25	RE 571 201	Mary Poppins	Motion Picture
26	RE 705 510	The Jungle Book	Motion Picture
27	RE 679 798	Mowgli	Drawing
28	RE 679 799	Baloo	Drawing
29	RE 679 795	Bagheera	Drawing
30	RE 679 805	King Louie	Drawing
31	RE 679 797	Kaa	Drawing
32	RE 679 807	Shere Khan	Drawing
33	Lp 38 283	The Aristocats	Motion Picture
34	Gu 44 754	O'Malley	Drawing
35	Gu 44 750	Duchess	Drawing
36	Gu 44 748	Edgar	Drawing
37	Gu 44 745	Roquefort	Drawing
38	VA 1-099-033	Marie Valentine Spring 2002	Style Guide
39	Lp 39 817	Bedknobs and Broomsticks	Motion Picture
40	Gu 46 904	Crocky	Drawing
41	Gu 46 908	Sailor Bear	Drawing
42	Gu 46 906	Codfish	Drawing
43	Gu 46 917	Secretary Bird	Drawing
44	LP 42 905	Robin Hood	Motion Picture
45	Gu 46 582	Robin Hood	Drawing
46	Gu 46 583	Little John	Drawing
47	Gu 46 584	Sir Hiss	Drawing
48	Gu 47 230	Sheriff of Nottingham	Drawing
49	Gu 47 762	Friar Tuck	Drawing

1	Gu 46 585	Prince John	Drawing
2	Gu 50 764	Maid Marion	Drawing
3	Gu 50 763	Lady Cluck	Drawing
4	Lp 49 678	The Rescuers	Motion Picture
5	Gp 96 289	Miss Bianca	Drawing
6	Gp 96 286	Orville	Drawing
7	Gp 96 288	Madame Medusa	Drawing
8	Gp 96 287	Bernard	Drawing
9	Gp 103 814	Penny	Drawing
10	Gu 57 278	Rufus	Drawing
11	Gu 56 625	Evinrude	Drawing
12	PA 1 371	Pete's Dragon	Motion Picture
13	Gp 111 695	Elliott the Dragon	Drawing
14	PA 125 861	The Fox and the Hound	Motion Picture
15	Vau 10 933	Todd (Young)	Drawing
16	Vau 10 930	Copper (Pup)	Drawing
17	Vau 10 936	Vixey	Drawing
18	Vau 10 928	Big Mama	Drawing
19	Vau 12 417	Dinky	Drawing
20	Vau 12 418	Boomer	Drawing
21	Vau 12 415	Squeeks	Drawing
22	PA 252 525	The Black Cauldron	Motion Picture
23	Vau 24 517	Eilonwy	Drawing
24	Vau 29 561	Ffleddur	Drawing
25	Vau 24 518	Gurgi	Drawing
26	Vau 24 070	Hen Wen	Drawing
27	Vau 24 592	The Horned King	Drawing
28	Vau 24 519	Taran	Drawing
29	Vau 47 075	Orddu	Drawing
30	Vau 47 073	Orgoch	Drawing
31	Vau 47 074	Orwen	Drawing
32	PA 290 808	The Great Mouse Detective	Motion Picture
33	Vau 76 103	Basil 185-126	Model Sheet
34	Vau 76 102	Dr. Dawson 1284-80	Model Sheet
35	Vau 81 570	Olivia	Model Sheet
36	Vau 76 100	Ratigan 285-166	Model Sheet
37	Vau 81 572	Fidget	Model Sheet
38	Vau 81 571	Flaversham	Model Sheet
39	Vau 86 112	Felicia - Clean Up Model 0238	Model Sheet
40	Vau 76 104	Toby 285-170	Model Sheet
41	Vau 85 019	Mrs. Judson	Model Sheet
42	Vau 85 021	Queen Victoria	Model Sheet
43	Vau 85 022	Bartholomew	Model Sheet
44	PA 385 556	Oliver and Company	Motion Picture
45	Vau 104 921	Dodger Construction Sheets	Model Sheet
46	Vau 104 920	Einstein Construction Sheets	Model Sheet
47	Vau 104 919	Frances Construction Sheets	Model Sheet
48	Vau 104 916	Rita Construction Sheets	Model Sheet
49	Vau 109 377	Oliver Rough Model	Model Sheet

1	VAu 109 379	Tito - Ruff Model	Model Sheet
2	VAu 119 949	How to Draw Georgette	Model Sheet
3	PA 431 543	The Little Mermaid	Motion Picture
4	VAu 123 355	Ariel 9-9-87 Ruff (Ariel)	Drawings
5	VAu 123 351	Scuttle	Drawings
6	VAu 123 354	Ruff Sebastian 9-4-87 (Sebastian)	Drawings
7	VAu 123 348	Ruff Ursula 9-9-87 (Ursula)	Drawings
8	VAu 123 352	Prince Eric	Drawings
9	VAu 123 350	Triton	Drawings
10	VAu 123 353	FLOTSAM/JETSAM	Drawings
11	VAu 123 349	Flounder	Drawings
12	PAu 1 024 341	DuckTales	Motion Picture
13	VAu 101 067	Launchpad McQuack	Pamphlet of Drawings
14	VAu 101 067	Webby	Pamphlet of Drawings
15	VAu 101 067	Doofus	Pamphlet of Drawings
16	VAu 101 067	Mrs. Beakley	Pamphlet of Drawings
17	VAu 101 067	Duckworth	Pamphlet of Drawings
18	PA 486 535	The Rescuers Down Under	Motion Picture
19	VAu 161 749	Cody	Model Sheets
20	VAu 155 884	Jake (Rough Models)	Model Sheets
21	VAu 155 844	McLeach (Rough Model)	Model Sheets
22	VAu 170 264	Marahute (Rough Model)	Model Sheets
23	PA 542 647	Beauty and the Beast	Motion Picture
24	VAu 200 866	Belle (Beauty and the Beast)	Artwork
25	VAu 210 914	Beast	Licensing Kit
26	VAu 194 311	Maurice (Beauty and the Beast)	Artwork
27	VAu 199 855	Mrs. Potts (Beauty and the Beast)	Artwork
28	VAu 200 868	Cogsworth (Beauty and the Beast)	Artwork
29	VAu 194 310	Lumiere (Beauty and the Beast)	Artwork
30	VAu 201 337	Chip (Beauty and the Beast)	Artwork
31	VAu 194 307	Gaston (Beauty and the Beast)	Artwork
32	VAu 194 309	LeFou (Beauty and the Beast)	Artwork
33	VAu 199 856	Phillipe (Beauty and the Beast)	Artwork
34	VAu 200 869	Featherduster (Beauty and the Beast)	Artwork
35	PA 583 905	Aladdin	Motion Picture
36	VAu 215 432	Aladdin - Aladdin	Model Sheet
37	VAu 215 453	Aladdin - Genie	Model Sheet
38	VAu 215 793	Aladdin - Abu	Model Sheet
39	VAu 218 349	Aladdin - Iago	Model Sheet
40	VAu 230 534	Aladdin - Rasoul	Model Sheet
41	VAu 218 348	Aladdin - The Sultan	Model Sheet
42	VAu 230 533	Aladdin - Jafar	Model Sheet
43	VAu 221 841	Aladdin - Jasmine	Model Sheet
44	VAu 221 842	Aladdin - Jafar as Beggar	Model Sheet
45	VAu 232 164	Aladdin - Narrator	Model Sheet

1	PA 659 979	The Lion King	Motion Picture
2	VAu 246 448	The Lion King - Mufasa	Model Sheet
3	VAu 245 946	The Lion King - Sarabi	Model Sheet
4	VAu 246 447	The Lion King - Simba	Model Sheet
5	VAu 246 440	The Lion King - Young Simba	Model Sheet
6	VAu 246 438	The Lion King - Nala	Model Sheet
7	VAu 246 664	The Lion King - Young Nala	Model Sheet
8	VAu 245 947	The Lion King - Rafiki	Model Sheet
9	VAu 245 945	The Lion King - Shenzi, Banzai & Ed	Model Sheet
10	VAu 246 437	The Lion King - Pumbaa	Model Sheet
11	VAu 245 662	The Lion King - Timon	Model Sheet
12	VAu 246 446	The Lion King - Scar	Model Sheet
13	VA 611 201	Zazu	Licensing Kit
14	PA 720 179	Pocahontas	Motion Picture
15	VAu 262 859	Pocahontas - Pocahontas Standing	Artwork
16	VAu 261 970	Pocahontas - Powhatan	Artwork
17	VAu 261 967	Pocahontas - Percy	Artwork
18	VAu 302 884	Pocahontas - John Smith	Artwork
19	VAu 302 886	Pocahontas - Meeko the Raccoon	Artwork
20	VAu 302 883	Pocahontas - Flit the Hummingbird	Artwork
21	VAu 300 559	Pocahontas - Ratcliffe	Artwork
22	VAu 302 885	Pocahontas - Grandmother Willow	Artwork
23	PA 765 713	Toy Story	Motion Picture
24	VAu 337 565	Toy Story - Woody	Artwork
25	VAu 337 566	Toy Story - Buzz Lightyear	Artwork
26	VAu 337 567	Toy Story - Hamm	Artwork
27	VAu 337 568	Toy Story - Rex	Artwork
28	VAu 337 569	Toy Story - Bo Peep Lamp and Sheep	Artwork
29	VAu 337 186	Toy Story - Lenny	Artwork
30	VAu 273 627	Toy Story - Mom	Artwork
31	VAu 348 598	Toy Story - Andy	Artwork
32	VAu 348 599	Toy Story - Hannah	Artwork
33	PA 795 221	The Hunchback of Notre Dame	Motion Picture
34	VAu 336 992	The Hunchback of Notre Dame - Quasimodo	Model Sheet
35	VAu 332 434	The Hunchback of Notre Dame - Esmeralda	Model Sheet
36	VAu 336 056	The Hunchback of Notre Dame - Phoebus	Model Sheet
37	VAu 336 057	The Hunchback of Notre Dame - Djali	Model Sheet
38	VAu 343 663	The Hunchback of Notre Dame - Gargoyles	Model Sheets
39	VAu 336 058	The Hunchback of Notre Dame - Clopin	Model Sheet
40	VAu 336 059	The Hunchback of Notre Dame - Frollo	Model Sheet
41	VAu 336 878	The Hunchback of Notre Dame - Will Doll/Sam Doll	Model Sheet
42	PA 670 961	Hercules	Motion Picture
43	VAu 369 603	Hercules - Hercules	Model Sheets
44	VAu 369 600	Hercules - Baby Hercules	Model Sheets
45	VAu 367 973	Hercules - Meg	Model Sheets
46	VAu 369 605	Hercules - Pegasus	Model Sheets
47	VAu 369 598	Hercules - Baby Pegasus	Model Sheets
48	VAu 367 965	Hercules - Phil	Model Sheets
49	VAu 367 964	Hercules - Hades	Model Sheets

1	VAu 367 969	Hercules - Pain	Model Sheets
2	VAu 375 850	Hercules - Panic	Model Sheets
3	VAu 377 944	Hercules - Hydra Head	Model Sheet
4	PA 799 025	Mulan	Motion Picture
5	VA 849 510	Mulan	Style Guide
6	VAu 379 045	The Legend of Mulan - Mulan	Model Sheets
7	VAu 379 027	The Legend of Mulan - Mulan as Ping	Model Sheets
8	VAu 379 021	The Legend of Mulan - Mushu	Model Sheets
9	VAu 379 024	The Legend of Mulan - Shang	Model Sheets
10	VAu 378 480	The Legend of Mulan - Kahn	Model Sheets
11	VAu 381 069	The Legend of Mulan - Cricket	Model Sheets
12	PA 901 890	A Bug's Life*	Motion Picture
13	VA 875 986	A Bug's Life*	Style Guide
14	VAu 399 357	Flik*	Model Sheets
15	VAu 399 356	Hopper*	Model Sheets
16	VAu 399 351	Atta*	Model Sheets
17	VAu 399 349	Dot*	Model Sheets
18	VAu 399 343	Dim*	Model Sheets
19	VAu 399 352	Tuck & Roll*	Model Sheets
20	VAu 399 350	Francis*	Model Sheets
21	VAu 399 348	Heimlich*	Model Sheets
22	VAu 399 353	Slim*	Model Sheets
23	VAu 399 342	Rosie*	Model Sheets
24	VAu 399 346	P.T. Flea*	Model Sheets
25	VAu 399 345	Manny*	Model Sheets
26	VAu 399 344	Gypsy*	Model Sheets
27	VAu 399 347	Thumper*	Model Sheets
28	VAu 399 354	Molt*	Model Sheets
29	VAu 399 355	Queen*	Model Sheets
30	PA 959 870	Toy Story 2*	Motion Picture
31	VAu 414 563	Toy Story 2 - Al's Car*	Model Sheet
32	VAu 405 573	Toy Story 2 - Bullseye*	Model Sheet
33	VAu 406 700	Toy Story 2 - Coffee Table*	Model Sheet
34	VAu 407 195	Toy Story 2 - Cushy Chair*	Model Sheet
35	VAu 405 571	Toy Story 2 - Emporer Zurg*	Model Sheet
36	VAu 405 572	Toy Story 2 - Jessie*	Model Sheet
37	VAu 405 197	Toy Story 2 - L'il Yippie*	Model Sheet
38	VAu 405 574	Toy Story 2 - Prospector*	Model Sheet
39	VAu 407 196	Toy Story 2 - Wood Chair*	Model Sheet
40	VA960 902	Toy Story 2 - Style Guide*	Style Guide
41	PA 974 011	Dinosaur	Motion Picture
42	VAu 486 473	Aladar	Model Sheet
43	VAu 486 477	Baylene	Model Sheet
44	VAu 486 476	Bruton	Model Sheet
45	VAu 486 478	Eema	Model Sheet
46	VAu 486 475	Kron	Model Sheet
47	VAu 486 474	Neera	Model Sheet
48	VAu 486 472	Plio	Model Sheet
49	VAu 486 479	Suri	Model Sheet

1	VAu 486 471	Yar	Model Sheet
2	VA 996 530	Dinosaur - Phase I	Style Guide
3	VA 992 942	Dinosaur - Phase II	Style Guide
4	PA 940 885	The Emperor's New Groove	Motion Picture
5	VA 999 573	Emperors New Groove	Style Guide
6	VAu 479 682	Kronk	Model Sheet
7	VAu 479 685	Kuzco	Model Sheet
8	VAu 479 683	Kuzco Llama	Model Sheet
9	VAu 479 684	Pacha	Model Sheet
10	VAu 479 681	Yzma	Model Sheet
11	PA 1-250-536	The Incredibles	Motion Picture
12	VA 1-242-351	The Incredibles	Style Guide
13	PA 1-322-908	Cars	Motion Picture
14	VA 1-326-323	Cars – Style Guide	Style Guide
15	VA 1-403-647	Hannah Montana – Branding Guide	Style Guide
16	PA 659-601	Tim Burton's The Nightmare Before Christmas	Motion Picture
17	PA 1-313-530	High School Musical	Motion Picture
18	VA 1-405-082	High School Musical – Branding Guide	Style Guide
19	PA 1-627-575	Hannah Montana the Movie	Motion Picture
20	PA 1-635-067	Up	Motion Picture
21	PA 1-641-991	G-Force	Motion Picture
22	PA 1-606-305	Wall-E	Motion Picture
23	VA 1-663-815	Wall-E – Branding and Supplement Style Guide RSM 2008	Style Guide
24	PA 1-598-561	High School Musical 2	Motion Picture
25	VA 1-651-813	High School Musical 2 – Summer 2008 Style Guide Supplement	Style Guide
26	PA 1-613-593	High School Musical 3: Senior Year	Motion Picture
27	VA 1-655-713	Beverly Hills Chihuahua	One Sheet
28	PA 1-611-956	Beverly Hills Chihuahua	Motion Picture
29	Pau 2-921-728	Little Mermaid III: Ariel's Beginning	Screenplay
30	VA 515-038	Little Mermaid III: Ariel's Beginning	Comic Book
31	PA 1-623-231	Bedtime Stories	Motion Picture
32	PA 1-588-972	Underdog	Motion Picture
33	PA 1-595-126	Enchanted	Motion Picture
34	PA 1-332-118	Meet the Robinsons	Motion Picture
35	VA 1-358-218	Meet the Robinsons—Style Guide	Style Guide
36	PA 1-122-518	Cinderella II : Dreams come true / produced by Walt Disney Television Animation ; directed by John Kafka	Motion Picture
37	PA 1-612-331	Cinderella III: A Twist in Time	Motion Picture
38	PA 1-611-943	Tinker Bell	Motion Picture
39	PA 1-617-950	Bolt	Motion Picture
40	VA 1-663-828	Bolt – Fall/Winter Style Guide 2008	Style Guide
41	PA 1-688-323	Toy Story 3	Motion Picture
42	VA 1-800-737	Toy Story 3: GC Product Dev – Style Guide – Spring/Summer 2010	Style Guide

PA 1-348-114	Handy Manny: no. 1-01	Motion Picture
VAu 959-473	Handy Manny Design Pack – Characters	Drawings
VA 1-650-599	Handy Manny Repair Shop – Spring/Summer 2008 Product Development Guide	Style Guide

EXHIBIT B**DEI'S TRADEMARKS**

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Mickey Mouse	Typed Drawing	3,115,395	7/11/2006
Mickey Mouse	Standard Character Mark	3,767,849	3/30/2010
Mickey Mouse	Typed Drawing	3,006,349	10/11/2005
Mickey Mouse	Typed Drawing	0,315,056	7/17/1934
Mickey Mouse	Standard Character Mark	3,750,188	2/16/2010
Mickey Mouse	Typed Drawing	1,152,389	4/28/1981
Mickey Mouse	Design Only	2,704,887	4/8/2003
Mickey Mouse Head Device	Design Only	2,781,693	11/11/2003
Minnie Mouse	Typed Drawing	3,102,338	6/06/2006
Minnie Mouse	Design Only	2,700,619	3/25/2003
Minnie Mouse	Standard Character Mark	3,767,850	3/30/2010
Minnie Mouse	Standard Character Mark	3,740,338	1/19/2010
Minnie Mouse	Typed Drawing	3,002,502	9/27/2005
Pluto	Typed Drawing	1,152,383	4/28/1981
Pluto	Design Only	2,707,323	4/15/2003
Goofy	Typed Drawing	1,159,124	6/30/1981
Goofy	Design Only	2,721,608	6/3/2003
Donald Duck	Typed Drawing	1,161,868	7/21/1981
Donald Duck	Design Only	2,700,620	3/25/2003

1	Donald Duck	Typed Drawing	3,150,077	9/26/2006
2	Daisy Duck	Design Only	2,704,890	4/8/2003
3	Disney	Typed Drawing	1,162,727	7/28/1981
4	Disney	Typed Drawing	3,490,082	8/19/2008
5	Disney Princess	Standard Character Mark	3,459,442	7/1/2008
6	Walt Disney	Typed Drawing	1,141,312	11/11/1980
7	Walt Disney Signature	Standard Character Mark	3,584,878	3/3/2009
8	Winnie the Pooh	Typed Drawing	3,024,287	12/6/2005
9	Pooh	Design Only	2,704,888	4/8/2003
10	Pooh	Typed Drawing	3,395,652	3/11/2008
11	Piglet	Standard Character Mark	4,118,780	3/27/2012
12	Piglet	Design Only	2,700,618	3/25/2003
13	Tigger	Design Only	2,860,445	7/6/2004
14	Eeyore	Design Only	3,591,616	3/17/2009
15	Eeyore	Typed Drawing	3,464,628	7/8/2008
16	Eeyore	Standard Character Mark	3,658,573	7/21/2009
17	Walt Disney's Cinderella	Design Plus Words, Letters, and/or Numbers	3,057,988	2/7/2006
18	Walt Disney's Snow White & the Seven Dwarfs	Design Plus Words, Letters, and/or Numbers	2,891,463	10/5/2004
19	Walt Disney's Sleeping Beauty	Design Plus Words, Letters, and/or Numbers	2,895,966	10/19/2004
20	Sleeping Beauty	Standard Character Mark	3,775,134	4/13/2010
21	Peter Pan	Standard Character Mark	3,745,492	2/2/2010

1	Walt Disney's Peter Pan	Design Plus Words, Letters, and/or Numbers	2,895,967	10/19/2004
2	Peter Pan	Standard Character Mark	3,662,111	7/28/2009
3	Tinker Bell	Standard Character Mark	3,648,929	7/20/2006
4	Tinker Bell	Standard Character Mark	3,636,910	6/9/2009
5	Tinker Bell	Design Only	3,624,833	5/19/2009
6	Tink	Typed Drawing	3,734,512	1/5/2010
7	Hannah Montana	Standard Character Mark	3,478,026	7/29/2008
8	Hannah Montana	Standard Character Mark	3,413,555	4/15/2008
9	Hannah Montana	Standard Character Mark	3,473,757	7/22/2008
10	Hannah Montana	Standard Character Mark	3,413,552	4/15/2008
11	Lilo & Stitch	Typed Drawing	2,811,097	2/3/2004
12	Lilo & Stitch	Typed Drawing	2,845,107	5/25/2004
13	Pinocchio	Standard Character Mark	Serial Number 77618061	n/a
14	Pinocchio	Standard Character Mark	Serial Number 77625073	n/a
15	Cars	Design Plus Words, Letters, and/or Numbers	3,358,115	12/18/2007
16	Cars	Design Plus Words, Letters, and/or Numbers	3,178,664	11/28/2006
17	Lightning McQueen	Standard Character Mark	3,370,157	1/15/2008
18	Mater	Standard Character Mark	3,406,600	4/1/2008
19	Rust-Eze	Standard Character Mark	3,294,617	9/18/2007
20	Doc Hudson	Standard Character Mark	3,321,900	10/23/2007
21	Toy Story	Typed Drawing	2,520,404	12/18/2001

1	Toy Story	Standard Character Mark	3,971,114	5/31/2011
2	Ariel	Standard Character Mark	3,814,910	7/6/2010
3	Beauty and the Beast	Typed Drawing	2,961,693	6/14/2005
4	Princess Jasmine	Standard Character Mark	3,998,366	7/19/2011
5	Princess Jasmine	Standard Character Mark	Serial Number 85,182,806	n/a
6	High School Musical	Standard Character Mark	3,506,572	9/23/2008
7	High School Musical	Standard Character Mark	3,433,096	5/20/2008
8	High School Musical	Standard Character Mark	3,420,394	10/24/2006
9	High School Musical	Standard Character Mark	3,469,823	7/15/2008
10	Meet the Robinsons	Standard Character Mark	3,420,082	4/29/2008
11	Meet the Robinsons	Standard Character Mark	3,354,473	12/11/2007
12	The Cheetah Girls	Standard Character Mark	3,252,269	6/12/2007
13	Walt Disney Pictures Presents The Wild	Standard Character Mark	3,389,689	2/26/2008
14	Disney Bolt	Standard Character Mark	3,648,251	6/30/2009
15	Disney Bolt	Standard Character Mark	3,604,222	4/7/2009
16	Wall-E	Standard Character Mark	3,686,824	9/22/2009
17	Wall-E	Standard Character Mark	3,528,986	11/4/2008
18	Handy Manny	Standard Character Mark	3,276,261	8/7/2007
19	Handy Manny	Standard Character Mark	3,643,979	6/23/2009

EXHIBIT CDC COMICS' COPYRIGHTED DESIGNS

Copyright Registration	Title of Work (Character)	Type of Work
Txu 1-080-661	DC Comics Anti-Piracy Guide Batman Robin Superman Wonderwoman Supergirl Justice League	Style Guide
VAu 1-059-478	DC Comics Anti-Piracy Style Guide	Style Guide
TX 5-581-762	Superman	Monthly Publication
TX 3-221-758	Superman	Style Guide
TXu-532-372	DC Comics style guide.	visual arts

EXHIBIT D**DC COMICS' TRADEMARKS**

Trademark	Trademark Registration No.	Trademark Registration Date
Bat Emblem	1,581,725	2/6/1990
Bat Emblem	1,581,593	2/6/1990
Bat Emblem	1,581,659	2/6/1990
Bat Emblem	2,119,266	12/9/1997
Bat Emblem (BATMAN BEGINS)	3,299,017	9/25/2007
Bat Emblem (BATMAN BEGINS)	3,110,604	6/27/2006
Bat Emblem (BATMAN BEGINS)	3,326,043	10/30/2007
Bat Emblem (BATMAN BEGINS)	3,313,612	10/16/2007
Bat Rep II	1,219,120	12/7/1982
BATARANG	3,291,749	9/11/2007
BATCAVE	4,135,575	5/1/2012
BATGIRL	3,070,999	3/21/2006
BATLINK	2,483,295	8/28/2001
BATMAN	856,045	9/3/1968
BATMAN	828,412	5/9/1967
BATMAN	839,561	11/28/1967
BATMAN	858,860	10/22/1968
BATMAN	1,221,720	12/28/1982
BATMAN	1,652,640	6/30/1991
BATMAN	1,622,749	11/13/1990
BATMAN	2,457,655	6/5/2001
BATMAN & ROBIN	2,171,937	6/7/1998
BATMAN & ROBIN	2,404,483	11/14/2000
BATMAN & ROBIN	2,245,040	5/11/1999
BATMAN BEYOND	2,762,067	9/3/2003

1	BATMAN BEYOND	2,688,935	2/18/2003
2	BATMAN BEYOND	2,649,865	11/12/2002
3	BATMAN BEYOND	2,643,418	10/29/2002
4	BATMAN on Bat Rep	382,770	11/12/1940
5	BATMAN on Bat Rep II (Side Face) (3D)	804,709	3/1/1966
6	Batman Rope Rep	1,262,504	12/27/1983
7	BATMAN THE RIDE	1,861,233	11/1/1994
8	BATMOBILE	1,124,961	9/11/1979
9	BATMOBILE (By Assignment)	1,179,342	11/24/1981
10	BATWING & Bat Emblem (outline)	2,858,716	6/29/2004
11	CATWOMAN	3,181,586	12/5/2006
12	CATWOMAN	1,052,504	11/9/1976
13	CATWOMAN	1,565,883	11/14/1989
14	CATWOMAN	1,883,034	3/7/1995
15	CATWOMAN	1,966,766	4/9/1996
16	DAILY PLANET	3,018,523	11/22/2005
17	DAILY PLANET	3,066,593	3/7/2006
18	DAILY PLANET	3,349,268	12/4/2007
19	DOUBLE W Design	1,332,090	4/23/1985
20	GOTHAM CENTRAL	3,391,794	3/4/2008
21	GOTHAM CITY	3,353,156	12/11/2007
22	GOTHAM GIRLS	2,868,577	8/3/2004
23	GOTHAM KNIGHTS	3,391,795	3/4/2008
24	JIMMY OLSEN	1,190,637	2/23/1982
25	JOKER	1,052,503	11/9/1976
26	KRYPTO	1,168,306	9/8/1981
27	KRYPTO THE SUPERDOG	3,061,112	2/21/2006
28	KRYPTO THE SUPERDOG	3,018,682	11/22/2005

1	KRYPTO THE SUPERDOG & S in Shield & Rep (in Flying Cape)	3,066,745	3/7/2006
2	KRYPTONITE	1,239,506	5/24/1983
3	KRYPTONITE	2,656,768	12/3/2002
4	LEX LUTHOR	1,634,007	2/5/1991
5	LEX LUTHOR	2,802,600	1/6/2004
6	LOIS & CLARK	3,355,918	12/18/2007
7	LOIS LANE	2,781,372	11/11/2003
8	LOIS LANE	1,184,702	1/5/1982
9	MAN OF STEEL	2,226,436	2/23/1999
10	MR. FREEZE	2,157,292	5/12/1998
11	ROBIN	1,294,617	9/11/1984
12	ROBIN	1,930,901	10/31/1995
13	Robin Rep II	1,279,991	5/29/1984
14	S Logo	1,197,814	6/15/1982
15	S Logo	1,182,041	12/15/1981
16	S Logo	1,199,552	6/29/1982
17	S Logo	1,199,630	6/29/1982
18	S Logo	1,182,172	12/15/1981
19	S Logo	1,189,376	2/9/1982
20	S Logo	1,184,881	1/5/1982
21	S Logo	1,199,690	6/29/1982
22	S Logo	1,179,537	11/24/1981
23	S Logo	2,226,415	2/23/1999
24	S Logo	2,211,378	12/15/1981
25	S Logo (black)	1,140,418	10/14/1980
26	S Logo (black)	1,173,150	10/13/1981
27	SUPERGIRL	2,023,091	12/6/2005
28	SUPERGIRL	2,943,882	4/26/2005

1	SUPERGIRL	1,238,334	5/17/1983
2	SUPERGIRL in Telescopic	414,623	6/19/1945
3	SUPERMAN	3,615,518	5/5/2009
4	SUPERMAN	1,070,290	7/26/1977
5	SUPERMAN	648,647	7/16/1957
6	SUPERMAN	1,184,822	1/5/1982
7	SUPERMAN	1,175,907	11/3/1981
8	SUPERMAN	1,180,068	12/1/1981
9	SUPERMAN	1,209,668	9/21/1982
10	SUPERMAN	1,182,947	12/22/1981
11	SUPERMAN	1,186,803	1/19/1982
12	SUPERMAN	1,183,841	12/29/1981
13	SUPERMAN	1,189,393	2/9/1982
14	SUPERMAN	1,248,822	8/23/1983
15	SUPERMAN	1,216,976	11/16/1982
16	SUPERMAN	1,181,536	12/8/1981
17	SUPERMAN	1,221,718	12/28/1982
18	SUPERMAN	2,204,195	11/17/1998
19	SUPERMAN	2,419,510	1/9/2001
20	SUPERMAN in Telescopic	1,185,526	1/12/1982
21	SUPERMAN in Telescopic	1,183,809	12/29/1981
22	SUPERMAN in Telescopic	1,185,853	1/12/1982
23	SUPERMAN in Telescopic	1,189,355	2/9/1982
24	SUPERMAN in Telescopic	1,200,394	7/6/1982
25	SUPERMAN in Telescopic	1,220,896	12/21/1982
26	SUPERMAN in Telescopic	1,182,226	12/15/1981
27	SUPERMAN in Telescopic	1,209,863	9/21/1982
28	SUPERMAN in Telescopic	1,218,552	11/30/1982
	SUPERMAN in Telescopic	1,181,537	12/8/1981

1	SUPERMAN in Telescopic	2,226,026	2/23/1999
2	SUPERMAN in Telescopic & Chains Rep II (Midrift)	391,821	11/25/1941
3	SUPERMAN in Telescopic (By Assignment)	371,803	10/10/1939
4	SUPERMAN in Telescopic (color)	1,108,577	12/12/1978
5	Superman Rep III (Running)	1,180,292	12/1/1981
6	Superman Rep III (Running)	1,178,048	11/17/1981
7	Superman Rep IV (Hands on Hips)	1,201,149	7/13/1982
8	Superman Rep IX (Flying Figure)	1,200,387	7/6/1982
9	Superman Rep V (Running)	1,209,743	9/21/1982
10	Superman Rep VI (Flying Figure)	1,201,167	7/13/1982
11	Superman Rep VII (Stepping-Up)	1,235,769	4/26/1983
12	Superman Rep VIII (Flying Figure)	1,229,321	3/8/1983
13	Superman Rep X (Standing Clenched Fists)	1,200,233	7/6/1982
14	SUPERMAN RIDE OF STEEL	2,485,624	9/4/2001
15	THE DARK KNIGHT	3,680,537	9/8/2009
16	THE DARK KNIGHT	3,690,538	9/8/2009
17	THE DARK KNIGHT	3,680,539	9/8/2009
18	THE DARK KNIGHT	1,458,274	9/22/1987
19	The Joker Rep	1,256,974	11/8/1983
20	THE MAN OF STEEL	1,433,864	3/24/1987
21	The Penguin Rep III (Jumping)	1,236,489	5/3/1983
22	TWO FACE	2,009,805	10/22/1996
23	WONDER WOMAN	1,221,717	12/28/1982
24	WONDER WOMAN	1,388,425	4/1/1986
25	WONDER WOMAN Logo	820,334	12/13/1966
26	WONDER WOMAN Logo II	395,739	6/9/1942
27	Wonder Woman Rep III	1,236,490	5/3/1983

EXHIBIT E
SANRIO CO.'S COPYRIGHTED DESIGNS

Copyright Registration	Title of Work (Character)	Type of Work
TX 3-769-888	SANRIO 1993 Product and Sales Promotion Catalog	Literary Work
VAu 684-322	Sanrio 2005 Character Guide	Graphic Artwork
VA 1-303-874	Character Merchandising	Collective work of artwork, text and photos
VA 1-296-115	2004 – 100 Characters	Graphic Artwork
VA 811-440	Bad Badtz Maru	Graphic Artwork
VAu 498-617	Chococat	Art original
VA 130-420	Hello Kitty	Graphic Artwork
VA 636-579	KeroKeroKeroppi	Sticker Book
VA 707-212	KeroKeroKeroppi	Pictorial Cartoon Drawing
VA 246-421	Little Twin Stars	Stickers
VA 840-495	Monkichi	Graphic Artwork
VA 130-419	My Melody	Graphic Artwork
VA 130-421	Patty & Jimmy	Graphic Artwork
VA 636-582	Pekkle	Graphic Artwork
VA 840-496	Picke Bicke	Graphic Artwork
VA 636-580	Pochaco	Sticker Book
VA 148-625	Tuxedo Sam	Stickers
VA 840-494	Winkipinki	Graphic Artwork
VA 636-581	Zashikibuta	Stickers
VA 1-352-721	Keroppi / Little Frog...Big Splash	Visual Material
Vau 1-078-385	Sanrio 2010 Character Guide	Visual Material

EXHIBIT FSANRIO'S TRADEMARKS

Trademark	Mark Drawing Code	Trademark Registration No.	Trademark Registration Date
Chococat	Design Plus Words, Letters, and/or Numbers	2,842,707	5/18/04
Chococat	Design Plus Words, Letters, and/or Numbers	2,707,592	4/15/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,705,164	4/8/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,714,130	5/6/03
Chococat	Design Plus Words, Letters, and/or Numbers	2,952,043	5/17/05
Chococat	Design Plus Words, Letters, and/or Numbers	2,845,315	5/25/04
Hello Kitty	Design Only	1,200,083	7/6/82
Hello Kitty	Design Only	1,277,721	5/15/84
Hello Kitty	Typed Drawing	1,215,436	11/9/82
Hello Kitty	Typed Drawing	1,279,486	5/29/84
Hello Kitty	Typed Drawing	1,391,550	4/29/86
Hello Kitty	Design Only	1,370,105	11/12/85
Keroppi	Standard Character Mark	3,531,383	11/11/08
Keroppi	Standard Character Mark	3,181,350	12/5/06
Keroppi	Standard Character Mark	3,531,382	11/11/08
Keroppi	Standard Character Mark	3,181,349	12/5/06
Keroppi	Standard Character Mark	3,436,548	5/27/08
Keroppi	Standard Character Mark	3,181,348	12/5/06

1	Keroppi	Standard Character Mark	3,181,347	12/5/06
2	Keroppi	Standard Character Mark	3,449,938	6/17/08
3	Keroppi	Standard Character Mark	3,531,381	11/11/08
4	Keroppi	Standard Character Mark	3,531,380	11/11/08
5	Keroppi	Standard Character Mark	3,181,346	12/5/06
6	Keroppi	Standard Character Mark	3,423,288	5/6/08
7	Keroppi	Standard Character Mark	3,181,345	12/5/06
8	Little Twin Stars	Typed Drawing	1,341,864	6/18/85
9	Little Twin Stars	Typed Drawing	1,192,946	4/6/82
10	Little Twin Stars	Standard Character Mark	3,245,999	5/29/07
11	Little Twin Stars	Standard Character Mark	3,245,998	5/29/07
12	Little Twin Stars	Standard Character Mark	3,245,997	5/29/07
13	Little Twin Stars	Standard Character Mark	3,245,994	5/29/07
14	Little Twin Stars	Standard Character Mark	3,245,993	5/29/07
15	Little Twin Stars	Standard Character Mark	3,245,992	5/29/07
16	Little Twin Stars	Standard Character Mark	3,245,991	5/29/07
17	Monkichi	Standard Character Mark	3,699,381	10/20/09
18	My Melody	Typed Drawing	1,305,637	11/20/84
19	My Melody	Typed Drawing	1,210,192	9/28/82
20	Pekkle	Typed Drawing	2,053,346	4/15/97
21	Pochacco	Typed Drawing	2,236,507	4/6/99
22	Pochacco	Typed Drawing	1,985,358	7/9/96

1	Sanrio	Design Plus Words, Letters, and/or Numbers	2,506,705	11/13/01
2	Sanrio	Typed Drawing	2,506,577	11/13/01
3	Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,680	6/3/03
4	Sanrio	Design Plus Words, Letters, and/or Numbers	2,742,381	7/29/03
5	Sanrio	Design Plus Words, Letters, and/or Numbers	2,721,679	6/3/03
6	Sanrio	Design Plus Words, Letters, and/or Numbers	2,693,639	3/4/03
7	Sanrio	Design Plus Words, Letters, and/or Numbers	2,696,063	3/11/03
8	KEROKEROKEROPPI	Standard Character Mark	3,531,378	11/11/2008
9	KEROKEROKEROPPI	Standard Character Mark	3,531,376	11/11/2008
10	Bow	Design only	3,260,857	7/10/2007
11	Bow	Design only	3,359,800	12/25/2007
12	Bow	Design only	3,359,801	12/25/2007
13	Bow	Design only	3,272,377	7/31/2007
14	Bow	Design only	3,260,860	7/10/2007
15	Bow	Design only	3,362,512	1/1/2008
16	Bow	Design only	3,348,608	12/4/2007
17	Bow	Design only	3,249,704	6/5/2007
18	Bow	Design only	3,362,514	1/1/2008
19	Bow	Design only	3,359,799	12/25/2007
20	Bow	Design only	3,260,858	7/10/2007

1	Bow	Design only	3,445,304	6/10/2008
2	Bow	Design only	3,260,859	7/10/2007
3	Bow	Design only	3,359,802	12/25/2007
4	Bow	Design only	3,260,861	7/10/2007
5	Bow	Design only	3,253,794	6/19/2007
6	Bow	Design only	3,260,862	7/10/2007
7	Outline of Hello Kitty	Design only	3,666,736	8/11/2009
8	Outline of Hello Kitty	Design only	3,756,724	3/9/2010
9	Outline of Hello Kitty	Design only	3,751,315	2/23/2010
10	Outline of Hello Kitty	Design only	3,868,138	10/26/2010
11	Outline of Hello Kitty	Design only	3,756,725	3/9/2010
12	Outline of Hello Kitty	Design only	3,666,736	8/11/2009
13	Outline of Hello Kitty	Design only	3,679,187	9/8/2009
14	Outline of Hello Kitty	Design only	3,865,208	10/19/2010
15	Dear Daniel	Standard Character Mark	3,072,626	3/28/2006
16	Dear Daniel	Standard Character Mark	3,067,244	3/14/2006

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Dean D. Pregerson and the assigned discovery Magistrate Judge is Jacqueline Chooljian.

The case number on all documents filed with the Court should read as follows:

CV12- 7347 DDP (JCx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

J. Andrew Coombs (SBN 123881)
 Annie S. Wang (SBN 243027)
 J. Andrew Coombs, A Prof. Corp.
 517 E. Wilson Ave., Suite 202
 Glendale, California 91206
 Tel.: (818) 500-3200 / Fax: (818) 500-3201

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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

Disney Enterprises, Inc., DC Comics, Hanna-Barbera
 Productions, Inc. and Sanrio, Inc.,

CASE NUMBER

CV12-07347-DDP(GCx)

PLAINTIFF(S)

v.

Jason Lancaster, an individual and d/b/a
 www.partyanimalsoc.com; The Party Animals, LLC;
 and Does 1 – 10, inclusive,

SUMMONS

DEFENDANT(S).

TO: DEFENDANT(S): Jason Lancaster, an individual and d/b/a www.partyanimalsoc.com;
 The Party Animals, LLC

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, J. Andrew Coombs, whose address is J. Andrew Coombs, A P.C., 517 East Wilson Avenue, Suite 202, Glendale, CA 91206. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: AUG 27 2012

By: _____

ANDRES PEDRO

Deputy Clerk

(Seal of the Court)

1202

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3).]

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

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<p>(a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> Disney Enterprises, Inc., DC Comics and Sanrio, Inc.</p>	<p>DEFENDANTS Jason Lancaster, an individual and d/b/a www.partyanimalsoc.com [See Attachment]</p>
<p>(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Los Angeles</p>	<p>County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only):</p>
<p>(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) J. Andrew Coombs (SBN 123881). J. Andrew Coombs, A Professional Corporation 517 E. Wilson Ave., Suite 202, Glendale, California 91206 Telephone: (818) 291-6444 / Facsimile: (818) 500-3201</p>	<p>Attorneys (If Known)</p>
<p>II. BASIS OF JURISDICTION (Place an X in one box only.)</p>	
<input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	<p>PTF DEF PTF DEF</p>
<input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<p>Citizen of This State <input type="checkbox"/> 1 <input type="checkbox"/> 1 Incorporated or Principal Place of Business in this State <input type="checkbox"/> 4 <input type="checkbox"/> 4</p>
	<p>Citizen of Another State <input type="checkbox"/> 2 <input type="checkbox"/> 2 Incorporated and Principal Place of Business in Another State <input type="checkbox"/> 5 <input type="checkbox"/> 5</p>
	<p>Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 <input type="checkbox"/> 3 Foreign Nation <input type="checkbox"/> 6 <input type="checkbox"/> 6</p>
<p>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)</p>	

<p>IV. ORIGIN (Place an X in one box only.)</p> <p><input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify):</p>	<p>PTF DEF PTF DEF</p> <p><input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge</p>
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<p>V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.)</p>	<p>CLASS ACTION under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>MONEY DEMANDED IN COMPLAINT: \$ _____</p>
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<p>VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)</p>		
<p>Copyright Infringement 17 U.S.C. §§ 101 et seq.</p>		

<p>VII. NATURE OF SUIT (Place an X in one box only.)</p>					
<p>OTHER STATUTES</p> <p><input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes</p>	<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p>	<p>TORTS</p> <p>PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>PRISONER PETITIONS</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition</p> <p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>CIVIL RIGHTS</p> <p><input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights</p> <p>PORFECTION/PENALTY</p> <p><input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSD Title XVI <input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>	

VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? No Yes

If yes, list case number(s):

CV12-07347-DDP(JCx)

FOR OFFICE USE ONLY: Case Number:

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? No Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- A. Arise from the same or closely related transactions, happenings, or events; or
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

Check here if the U.S. government, its agencies or employees is a named plaintiff.

Los Angeles County - Disney Enterprises, Inc., DC Comics

San Mateo County - Sanrio, Inc.

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

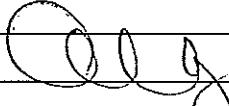
Check here if the U.S. government, its agencies or employees is a named defendant.

Los Angeles (All Defendants)

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles

X. SIGNATURE OF ATTORNEY (OR PRO PER): 

Date 8/24/12

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

Civil Cover Sheet Attachment

Disney Enterprises, Inc., DC Comics and Sanrio, Inc.,
Plaintiffs,

v.

Jason Lancaster, an individual and d/b/a www.partyanimalsoc.com; The Party
Animals, LLC; and Does 1 – 10, inclusive,

Defendants.